

Message

From: Crosby-Vega, Terri [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E439D8D14EAF4F8DA8661E95A3037052-CROSBY-VEGA, TERRI]
Sent: 9/29/2017 4:40:45 PM
To: Lamberth, Larry [Lamberth.Larry@epa.gov]
Subject: RE: Draft Comments for Discussion

When the OB/OD operations are covered under RCRA, that unit is not subject to the air regulations because of deferral. All other units at the facility should be covered in their air permit.

Terri Crosby-Vega
Environmental Engineer
USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Lamberth, Larry
Sent: Friday, September 29, 2017 10:55 AM
To: Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>
Subject: RE: Draft Comments for Discussion

General question... when a company like Daicel in KY operates an OBOD unit, do they not have to have an air permit?

From: Crosby-Vega, Terri
Sent: Friday, September 29, 2017 10:50 AM
To: Fortin, Kelly <Fortin.Kelly@epa.gov>
Cc: Anderson, Meredith <Anderson.Meredith@epa.gov>; Norman, Michael <Norman.Michael@epa.gov>; Lamberth, Larry <Lamberth.Larry@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Gaines, Jeff <Gaines.Jeff@epa.gov>; Kohler, Amanda <Kohler.Amanda@epa.gov>
Subject: FW: Draft Comments for Discussion

Kelly,
The information below is a very good summary of the activities at Holston. Thank-you for putting it in terms for everyone to understand the issues.
Terri

From: Fortin, Kelly
Sent: Friday, September 29, 2017 9:40 AM
To: Mitchell, Ken <Mitchell.Ken@epa.gov>; Ceron, Heather <Ceron.Heather@epa.gov>; Land, Eva <Land.Eva@epa.gov>; Spagg, Beverly <Spagg.Beverly@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dubose, Dick <DuBose.Dick@epa.gov>; Bloeth, Mark <Bloeth.Mark@epa.gov>; Cobb, Brandon <cobb.brandon@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Lamberth, Larry <Lamberth.Larry@epa.gov>; Spells, Charlene <Spells.Charlene@epa.gov>; Modak, Nabanita <Modak.Nabanita@epa.gov>; Arias, Megan <arias.megan@epa.gov>; Griffith, Carrie

<griffith.carrie@epa.gov>; Sturdivant, Donnette <Sturdivant.Donnette@epa.gov>

Cc: Kemker, Carol <Kemker.Carol@epa.gov>; Davis, Scott <Davis.ScottR@epa.gov>; Banister, Beverly <Banister.Beverly@epa.gov>; Toney, Anthony <Toney.Anthony@epa.gov>; Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>

Subject: RE: Draft Comments for Discussion

For clarification, there are three different open burn activities, in different locations, at the HSAAP facility.

- 1) Pan burning of munitions (steel pan on concrete pad to avoid contact with surface soil)– this activity is covered by the RCRA permit. This is allowed on a daily basis.
- 2) Cage burn (burn barrel) – of institutional waste – including plastic bags, filter socks, gloves and other PPE, and other industrial waste that may be “energized” (contain explosive residue). This is allowed on a daily basis by the Title V permit, but typically occurs weekly. This activity is being treated as exempt from the open burning prohibition in SIP, and is allowed by the Title V permit, but does not appear to be regulated under the RCRA permit (it is mentioned in the RCRA permit as being allowed by the Title V permit). It does not appear that this waste has been designated as “hazardous waste.”
- 3) Open pile burn of construction and demo waste, concrete, soil, etc. that may be “energized.” This activity is allowed quarterly by the Title V permit. These are often very large piles (30 ft) that may burn for 2-3 days. The piles are ignited with wood pallets and fuel oil. This activity is being treated as exempt from the open burning prohibition in the SIP, but does not appear to be regulated under the RCRA permit. It is not clear that this waste has been designated as “hazardous waste,” nor does it appear to be covered by the RCRA permit. This activity appears to have been stopped or limited at other military installations pursuant to TSCA.

Of note:

- 1) The 6000 acre facility has a permitted landfill. The facility also appears to be allowed, pursuant to the Title V permit, to open burn energized waste *from other facilities* for the purpose of disposal, if that is the only safe means.
- 2) TN indicated there are no ambient monitors at the facility to determine type or rate of emissions. Data from open burning at other military installations have found elevated levels of lead, arsenic, chloromethane, acrolein, dioxin, furans, and PCBs. Asbestos would be expected in the demo waste (this is not a complete list and would depend on factors such as materials burned, temperature, etc.).
- 3) The opening burning provision in TN regulations allows an exemption for “contaminated or potentially contaminated combustible materials,” only “where no other safe means of disposal exists.”
- 4) The public controversy surrounds whether other “safe means of disposal exist,” given other military facilities have employed approved technologies other than open burning for energized waste, the Army DDESB has a list of approved systems, etc.. The Army issued a report in 2012 that describes several other potential technologies for Holston, but the facility does not appear to intend to pursue them at this time. The report concludes that other technologies appear feasible, but that it would be difficult to obtain an air permit for incineration (lowest cost technology). Summaries/report attached for reference.

From: Mitchell, Ken

Sent: Thursday, September 28, 2017 11:19 AM

To: Ceron, Heather <Ceron.Heather@epa.gov>; Fortin, Kelly <Fortin.Kelly@epa.gov>; Land, Eva <Land.Eva@epa.gov>; Spagg, Beverly <Spagg.Beverly@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dubose, Dick <DuBose.Dick@epa.gov>; Ken Mitchell <klmatl@comcast.net>; Bloeth, Mark <Bloeth.Mark@epa.gov>; Cobb, Brandon <cobb.brandon@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Lamberth, Larry <Lamberth.Larry@epa.gov>; Spells, Charlene <Spells.Charlene@epa.gov>; Modak, Nabanita <Modak.Nabanita@epa.gov>; Arias, Megan <arias.megan@epa.gov>; Griffith, Carrie <griffith.carrie@epa.gov>; Sturdivant, Donnette <Sturdivant.Donnette@epa.gov>

Cc: Kemker, Carol <Kemker.Carol@epa.gov>; Davis, Scott <Davis.ScottR@epa.gov>; Banister, Beverly <Banister.Beverly@epa.gov>; Ken Mitchell <klmatl@comcast.net>; Toney, Anthony <Toney.Anthony@epa.gov>
Subject: Re: Draft Comments for Discussion

Heather....

I would like to suggest that we meet this coming Monday to discuss this (I've cc'ed the OSWI folks here, including the OAQPS OWSI person (who I think is Charlene Spells....Charlene...if that's not right, would you forward this on the right person)? I'll send out an e-vite. (Let me know if we need to meet sooner.)

Deliberative Process / Ex. 5

band one.

Deliberative Process / Ex. 5

Ken

From: Ceron, Heather
Sent: Thursday, September 28, 2017 9:00 AM
To: Fortin, Kelly; Land, Eva; Mitchell, Ken
Subject: FW: Draft Comments for Discussion

Ideas?

From: James Johnston [<mailto:James.Johnston@tn.gov>]
Sent: Thursday, September 28, 2017 8:57 AM
To: Ceron, Heather <Ceron.Heather@epa.gov>
Cc: lacey.hardin@tn.gov; John Trimmer <John.Trimmer@tn.gov>; Moe Baghernejad <Moe.Baghernejad@tn.gov>
Subject: RE: Draft Comments for Discussion

I did a quick review of the OSWI NSPS and Emissions Guideline at 40 CFR 60 Subparts EEEE and FFFF. The open burning pile and cage at HSAAP are neither new incineration units, OSWI units, nor air curtain incinerators (see 40 CFR 60.2885 and 40 CFR 60.2981) and therefore would not be subject to the OSWI NSPS or Emissions Guideline. Thus, there does not appear to be a federal or state air quality standard that would be triggered due open burning of lead contaminated material. Consequently, I am aware of any regulatory authority to require monitoring or recordkeeping for the lead content of the materials combusted in the open burning pile or cage in the Title V permit.

From: Ceron, Heather [<mailto:Ceron.Heather@epa.gov>]
Sent: Monday, September 25, 2017 7:56 AM
To: James Johnston
Subject: RE: Draft Comments for Discussion

Correct

From: James Johnston [<mailto:James.Johnston@tn.gov>]
Sent: Friday, September 22, 2017 4:37 PM
To: Ceron, Heather <Ceron.Heather@epa.gov>
Subject: Re: Draft Comments for Discussion

So if I read this correctly, they need to have some form of documentation that the cage and pile burns are not subject to OSWI. Correct?

Sent from my iPhone

On Sep 22, 2017, at 2:50 PM, Ceron, Heather <Ceron.Heather@epa.gov> wrote:

Jimmy,

Here is the information on the lead. Please let me know if you would like to have a call Monday morning to discuss before we send our official comments.

PSD and Title V applicability aside, there are different Clean Air Act standards for lead emissions from solid waste combustion depending on whether the solid waste is characterized as hazardous waste or non-hazardous waste. Non-hazardous solid waste combustion is subject to regulation under section 129 of the Clean Air Act. Institutional waste incineration units (IWI), "designed to discard materials by burning them at high temperature to leave as little residue as possible," are considered part of the class of "other solid waste incineration (OSWI)." Military facilities, such as HSAAP, are considered to be "institutional facilities." The standard for lead for non-hazardous solid waste is 226 µg/dscm, using Method 29. The OSWI regulations require waste stream separation and require the applicable requirements for the incineration unit to be included in the Title V permit. Combustion of solid hazardous waste is subject to the hazardous waste combustion NESHAP at 40 CFR 63. The overarching lead NAAQS standard is 0.15 µg/m³.

It is our understanding that the RCRA permit covers the munitions waste stream combusted in the burn pans. Based on our review of the information provided with the proposed permit, the cage and pile waste streams at HSAAP have not been separated or characterized as hazardous waste.

Thank you for your efforts on this.

Heather

From: James Johnston [<mailto:James.Johnston@tn.gov>]

Sent: Thursday, September 21, 2017 7:08 PM

To: Ceron, Heather <Ceron.Heather@epa.gov>

Subject: RE: Draft Comments for Discussion

Thank you. We are reviewing the comments and I have asked our asbestos coordinator about material burned in the pile. However, I do have a question about lead. Should the material being combusted contain lead, what applicable air quality regulation would apply and if so, at what threshold of lead contamination or lead emissions? (We are aware of the 0.5 ton/year applicability for lead monitoring, but I am unaware of any other applicable requirement that could potentially be triggered.)

From: Ceron, Heather [<mailto:Ceron.Heather@epa.gov>]

Sent: Thursday, September 21, 2017 1:24 PM

To: James Johnston

Subject: Draft Comments for Discussion

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Jimmy,

Deliberative Process / Ex. 5

Heather Ceron
404-562-9185 (w)

Personal Phone / Ex. 6